

February 3, 2020

VIA ECF

The Honorable Lorna G Schofield
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Jane Doe, et al. v. Trump Corp., et al., 1:18-cv-9936 (LGS)

Dear Judge Schofield:

Pursuant to the Court's September 5, 2019 Civil Case Management Plan and Scheduling Order (Doc. No. 110 (the "Scheduling Order")), the parties write respectfully to jointly submit to the Court their proposed schedule for expert disclosures.

The parties propose the following schedule for expert discovery:

Expert Identification	15 days after the close of fact discovery
Expert Reports Exchange	60 days after the close of fact discovery
Rebuttal Expert Identification	75 days after the close of fact discovery
Rebuttal Expert Reports Exchange	120 days after the close of fact discovery
Expert depositions to be completed	150 days after the close of fact discovery

The parties propose that the above deadlines be subject to modification without application to the Court upon the written consent of all parties, provided that all expert discovery is completed by the date set forth in the applicable scheduling order.

Finally, given that Plaintiffs are in the process of filing motions to compel document productions in response to certain non-party subpoenas (*see* Doc. Nos. 141, 142, 146), and received Defendants' first production of documents on January 30, 2020 (*see* Doc. No. 148), the parties anticipate that it may be necessary to seek an appropriate extension of the current discovery schedule. Plaintiffs are pursuing discovery expeditiously (*see* Doc. No. 148), and the parties will present any requests for extension to the Court in due course.

Respectfully submitted,

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